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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	
)	Case No. 2:13-cr-322-RCJ-(VCF)
Plaintiff,)	
)	
v.)	
)	
DANIEL LEE STRANDBERG,)	
)	
Defendant.)	

UNITED STATES' UNOPPOSED MOTION
TO FILE RESPONSES TO PETITIONER'S CLAIMS

The United States of America by and through Daniel G. Bogden, United States Attorney for the District of Nevada and Michael A. Humphreys, Assistant United States Attorney, respectfully moves this Court to grant a sixty-day continuance for the United States to file its response to the petition for ancillary hearing filed by Nevada State Bank in the above-captioned case.

After this Court signed the preliminary order of forfeiture in this case, the United States duly served all persons and/or corporations that might have an interest in the forfeited properties. On June 30, 2014, Nevada State Bank filed its Petition for Ancillary Hearing. The parties have been

1 actively and continuously making efforts to settle the case, and the parties are close to reaching a
2 settlement. Accordingly, the Government requests an additional sixty days to complete settlement
3 negotiations and consummate a settlement agreement with the Nevada State Bank.

4 On January 5, 2015, Counsel for the Government spoke to Allison Schmidt, counsel for the
5 petitioner, and Ms. Schmidt has given Government counsel permission to represent to this Court,
6 through this motion, that she consents to this motion.

7 This motion is not submitted solely for the purpose to delay or for any other improper
8 purpose.

9
10 WHEREFORE, the United States moves this Court to grant a sixty-day continuance, or until
11 March 8, 2015, for the United States to file a response to Nevada State Bank's petition of interest.

12 DATED this 7th day of January, 2015.

13 Respectfully submitted,

14 DANIEL G. BOGDEN
15 United States Attorney

16 /s/Michael A. Humphreys
17 MICHAEL A. HUMPHREYS

18
19 IT IS SO ORDERED:

20 
21 UNITED STATES MAGISTRATE JUDGE

22 DATED: January 9, 2015
23
24
25
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PROOF OF SERVICE

I, Ray Southwick, Forfeiture Support Associates Paralegal, certify that the following individuals were served with copies of the **Unopposed Motion to File Responses to Petitioner's Claims** on January 7, 2015, by the below identified method of service:

CM/ECF

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/s/ Ray Southwick
Ray Southwick
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